

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,
Plaintiff,

v.

RAHMON ALLEN
Defendant.

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No. 4:12 CR 291-GAF

DEFENDANT RAHMON ALLEN'S PROPOSED VOIR DIRE

NOW COMES defendant, RAHMON ALLEN, by and through his attorney,
QUINN A. MICHAELIS, and respectfully submits the following *voir dire* questions for
the Court's consideration:

(1) Do you believe that a person must be guilty if the government brings charges against
him?

(2) Are any members of law enforcement members of your family?

(3) Do you have any experience – good or bad – with any law enforcement officers?

(4) Do you read crime novels or mysteries?

(5) Do you watch television shows, movies, or reality shows based on crime, crime
solving, or the criminal justice system? If so, which ones?

(6) Have you, any family member, or close friend ever been harmed by a person who was a
drug user?

(7) Do you have any close friends, family members, or colleagues who are African-
American?

(8) Do you hold a strong opinion about drug use or abuse?

- (9) Are you involved in any organization or group the purpose of which is to support law enforcement?
- (10) What is your closest relationship with a person of African-American descent?
- (11) Do you take any medication?
- (12) If you take medication, does it interfere with your memory, your ability to concentrate, your ability to sit in one place for an extended period of time, or your ability to pay close attention to what is going on in the courtroom?
- (13) Do you participate in any social media groups or blogs? If so, which ones?
- (14) What is your primary source of news and information?
- (15) Do you listen to talk radio shows? If so, which ones?
- (16) Which television shows, if any, do you watch regularly?
- (17) Do you participate in any blogs, or subscribe to any on-line publications? If so, which ones?
- (18) Are you more likely to believe a law enforcement officer than other witnesses?
- (19) What opinions, if any, do you hold about Federal Bureau of Investigation (FBI) Agents?
- (20) What opinions, if any, do you hold about Drug Enforcement Agency (DEA) Agents?
- (21) Do you have any opinions about African-Americans that will influence your evaluation of the evidence in this case?
- (22) Do you hold any opinions about people who have been convicted of a crime in the past that would interfere with your ability to fairly judge a person?
- (23) Do you believe that a person who has been convicted of one crime is likely to commit another crime?

- (24) Do you have any opinions about the use of confidential informants by law enforcement? (25) Do you have any opinions about the use of secret tape recordings by law enforcement?
- (26) What are your opinions about marijuana use?
- (27) Have you or any of your close friends or family members had a substance abuse problem? (28) Have you or any of your close friends or family members been involved with AA or NA groups, or any other substance abuse treatment, counseling, or support group?
- (29) Have you had any experience with anyone who has experienced a drug overdose of any kind?
- (30) Have you, or any of your close associates, friends, or family members been a victim of crime committed by a person involved with drugs?
- (31) What kind of music do you listen to?
- (32) Do you have any opinions about rap music, or the rap music industry?
- (33) Are you a member of, or do you have opinions about, the group Black Lives Matter, or any other organization that advocates for equal rights for members of minority groups?
- (34) Did you attend school with people of other races and ethnic backgrounds than yours? If so, did you attend school with African-Americans?
- (35) Do your children attend school with children of other races or ethnic backgrounds than yours? If so, do they have any friends who are African-Americans?
- (36) Do you work or socialize with people who are of a different race or ethnic background than you are? If so, do you work or socialize with African-Americans?

(37) Do you live in a neighborhood with neighbors who are of a different race or ethnic background than you are? If so, are any of your neighbors African-American?

(38) Have you ever used or tried any controlled substance?

Respectfully submitted,

s/Quinn A. Michaelis

Quinn A. Michaelis
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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2019, I electronically filed the above

DEFENDANT'S RAHMON ALLEN'S PROPOSED VOIR DIRE

with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on August 22, 2019.

By His Attorney,
s/ Quinn A. Michaelis
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